

INSPECTION ADMINISTRATIVE PROCEDURE

A-105

INSPECTION PERFORMANCE

March 21, 2003
Revision 3

Approved: _____ Date: _____
Verification and Confirmation Official

Concur: _____ Date: _____

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INSPECTION ADMINISTRATIVE PROCEDURE A-105, REV. 3

INSPECTION PERFORMANCE

1.0 PURPOSE

This procedure establishes the process to ensure the WTP Safety Regulation Division (OSR) inspections are executed in a planned, disciplined, and predictable manner.

2.0 POLICY

Inspections should be performed in accordance with RL/REG-98-24, *Inspection Program Implementation Plan for the Regulatory Oversight of the River Protection Project Waste Treatment Plant Contractor*, and the associated administrative and technical inspection procedures, including the guidance provided in this procedure. Variations from the established inspection program must be coordinated with the Verification and Confirmation Official (VCO). Assessments of inspection observations and communication of the results of the assessments with Contractor management are vital functions of the inspection staff and should be accomplished in a clear, technically correct, and defensible manner.

3.0 DEFINITIONS

Authorization Basis. The composite of information provided by the Contractor in response to radiological, nuclear, and process safety requirements that are the bases on which the DOE grants permission to perform regulated activities. The following are specific documents (including material incorporated by reference) that help to form the Authorization Basis:

- Safety Requirements Document (SRD), Volume II, 24590-WTP-SRD-ESH-01-001-02
- Integrated Safety Management Plan (ISMP), 24590-WTP-ISMP-ESH-01-001
- Preliminary Safety Analysis Report to Support Construction Authorization, General Information, 24590-WTP-PSAR-ESH-01-002-01
- Preliminary Safety Analysis Report to Support Construction Authorization, PT Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-02
- Preliminary Safety Analysis Report to Support Construction Authorization, LAW Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-03
- Preliminary Safety Analysis Report to Support Construction Authorization, HLW Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-04
- Preliminary Safety Analysis Report to Support Construction Authorization, Balance of Facility Specific Information, 24590-WTP-PSAR-ESH-01-002-05

- Revision to the BOF PSAR Adding Facilities/Systems to the Construction Authorization Request, 24590-WTP-ABCN-ESH-02-014
- Quality Assurance Manual (QAM), 24590-WTP-QAM-QA-01-001
- Radiation Protection Program for Design and Construction (RPP), 24590-WTP-RPP-ESH-01-001
- The information submitted in connection with a request for Standards Approval, a request for Construction Authorization, a request for Commissioning Authorization, or an Initial Safety Assessment. This includes the information associated with the requests as described in DOE/RL-96-0003, *DOE Regulatory Process for Radiological, Nuclear, and Process Safety for the River Protection Project Waste Treatment Plant Contractor*, and any other information submitted by the Contractor in connection with the requests.
- Amendments to the information described above that are on the Contractor's docket. Such amendments may be in the form of revisions to previously submitted documents, or new information that supplements previously submitted information.

The authorization basis begins at the Standards Approval regulatory action and continues throughout the design, construction, operation, and decommissioning of the River Protection Project Waste Treatment and Immobilization Plant Contractor facility.

Finding. An inconsistency with a commitment in the authorization basis or an item that is not in compliance with a requirement in the SRD or applicable regulations.

Assessment Follow-up Item: A matter that requires further inspection because of a potential problem, because specific Contractor or OSR action is pending, or because additional information is needed that was not available at the time of the inspection.

Occurrence Report: A report generated by the Contractor describing an event or condition that meets the Contractor's reporting threshold.

Other Follow-up Item: An item requiring inspection follow-up that was identified outside of the inspection process, such as a Contractor commitment made to the OSR via official correspondence, which OSR management chooses to track and verify through future inspection follow-up.

4.0 GENERAL REQUIREMENTS

4.1 RELATIONSHIP TO INSPECTION PLAN

Each OSR inspection should have an associated inspection plan prepared and approved before commencement of the inspection according to Inspection Administrative Procedure A-104, "Inspection Preparation." Each inspection should be conducted consistent with the scope of the

inspection plan. However, on rare occasions, it may be necessary to deviate from the plan during performance of the inspection to fully meet the inspection objectives or to follow up on situations involving newly discovered issues or imminent danger. In such cases, significant deviation from the inspection plan is acceptable if approved by the VCO. Major items of concern discovered during an inspection, clearly out of the scope of the inspection being performed, should be discussed with the VCO. The VCO may elect to address the concern in a separate inspection or modify the inspection plan to include a review of the area of concern, particularly if the concern involves imminent and/or significant danger to human health and safety or the environment. The VCO should also consider the expertise and qualifications of team members in determining if a separate inspection is needed.

4.2 OSR INSPECTION TEAM MEETINGS

In order for the lead inspector to keep current with inspection observations and to communicate them to Contractor management, frequent team meetings may be held during inspections. The lead inspector will schedule the time and place and designate the attendees for each meeting. The lead inspector will set the agenda and lead the discussion. Topics discussed at team meetings will include such items as schedule, problems encountered, potential Findings and follow-up items, need for additional information and documentation from the Contractor, and need for contacting additional contractor personnel. Generally, team meetings will be held daily, as needed, during the course of an inspection.

4.3 IDENTIFICATION AND PROCESSING OF ASSESSMENT FOLLOW-UP ITEMS

Inspectors may identify items or concerns that will require further inspection because of a potential problem, pending action by the Contractor or OSR, or additional information that is needed that was not available at the time of the inspection. The lead inspector should be informed of the potential follow-up items at inspection team meetings or through informal discussions. The inspector should, if possible, arrange for follow-up actions with appropriate Contractor personnel to resolve potential follow-up items during the inspection.

Inspectors shall avoid initiating unnecessary follow-up items; such items should not be used as “ticklers” to remind inspectors of some future activity. The goal of the OSR is to close open items as quickly as possible and except for extenuating circumstances they shall not remain open for more than one year.

4.4 IDENTIFICATION AND PROCESSING OF FINDINGS

Inspectors make potential Findings when they determine the performance of the Contractor or a supplier to the Contractor is not consistent with the commitments in the authorization basis or in compliance with the requirements in the Contract, the authorization bases, or applicable regulations. The inspector who identified the potential Finding shall discuss it with the team leader as soon as practical but not later than the daily team meeting. If the two inspectors agree

to the potential Finding, the team leader and the inspector will notify the Contractor and the VCO as soon as practical. If the VCO agrees with the Finding, the inspector shall document it in the inspection report and shall include a detailed description of the authorization basis requirement or Contract/SRD/regulatory requirement that was violated, the item that deviated from the requirement, an assessment of the significance of the deviation, and the inspection follow-up tracking number. The documentation also should include whether the Contractor had identified the deviation as part of its own program, and whether the Contractor had entered the item into its corrective action tracking system and completed adequate corrective action or specified a reasonable date for completion of the corrective action.

A determination will be made by the VCO whether the Contractor will be notified of all Findings in a formal Notice of Finding subsequent to the inspection, or whether some Findings will be classified as non-cited Findings and included in the inspection report but not in the Notice of Finding. Consideration should be given to calling a Finding non-cited if it meets the following criteria:

- The Finding was identified by the Contractor, other than as the result of an event. Consideration also may be given to a Finding identified by the inspector during the inspection if such Finding meets the remaining criteria.
- It was not programmatic or repetitive in nature, nor did it indicate a breakdown of the Contractor's corrective action program.
- It was properly reported, if required by a regulatory requirement.
- It was entered into the Contractor's corrective action tracking system.
- Corrective action was completed by the conclusion of the inspection. Items being appropriately tracked and having a committed completion date beyond the conclusion of the inspection also may be considered as being non-cited Findings.
- There is no evidence of willfulness or wrongdoing associated with the Finding.

Non-cited Findings are not discussed in the cover letter to the Contractor, and will not be tracked in the Inspection Follow-up system.

For those Findings discussed in the cover letter, the Contractor should be requested to provide a written response describing its assessment of the Findings and corrective actions planned to address them.

4.5 FOLLOW-UP ITEMS OR FINDINGS WITH THE POTENTIAL FOR IMMINENT OR SIGNIFICANT DANGER

Any follow-up item or potential Finding with the potential for imminent and/or significant danger to human health and safety or the environment should be reported immediately to the lead inspector and VCO, or if they are unavailable, to the Safety Regulation Official (SRO) or

designee. An OSR representative should not leave the inspection site until these significant concerns are communicated to the Contractor and the VCO and/or SRO. The SRO may decide to continue OSR representation until a clear course of action to address the concerns is identified and agreed upon by the OSR. In such instances, the Manager, Office of River Protection, also should be advised of the planned course of action.

4.6 EXIT MEETING

The lead inspector and inspection team, as directed by the lead inspector, should conduct necessary preparation for the exit meeting with the Contractor. The exit meeting will be conducted in accordance with Inspection Administrative Procedure A-103, "Entrance and Exit Meetings."

Attachments: None